

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

IAN RICE, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	Case No.
WELLS FARGO BANK, N.A., et al.,	)	
	)	
Defendants.	)	
	)	

**NOTICE OF REMOVAL**

Defendant Vital Recovery Services, Inc. (“Vital Recovery”), by undersigned counsel, pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 15 U.S.C. § 1692k, files this Notice of Removal, and in support hereof sets forth the following grounds:

1. On or after June 4, 2013, Defendant Vital Recovery was served with Plaintiff’s Complaint, a copy of which is attached hereto, in an action entitled Ian Rice, et al. v. Wells Fargo Bank, N.A., et al., filed of record with the Clerk of the Circuit Court for Anne Arundel County, Maryland, Case No. 02-C-13-178493. Plaintiff has demanded a jury trial.
2. Plaintiff’s Complaint purports to set forth, *inter alia*, causes of action under the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692 *et seq.*, Compl. ¶¶ 49-52, and the Maryland Consumer Debt Collection Act, §§ 14-204 *et al.* Compl. ¶¶ 53-57.
3. This Court has original jurisdiction over Plaintiff’s cause of action based on 15 U.S.C. §§ 1692, *et seq.*, as set forth in 28 U.S.C. § 1331 and 15 U.S.C. § 1692k(d). Pursuant to 28 U.S.C. § 1441, therefore, the civil action pending in the Circuit Court for Anne Arundel County, is removable to this Court.
4. Copies of all process, pleadings and orders served upon or in the possession of Defendant Vital Recovery in this action are attached hereto.
5. Thirty (30) days have not yet expired since Defendant Vital Recovery’s receipt of Plaintiff’s Complaint.
6. Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) consents to the removal of this action from the Circuit Court for Anne Arundel County to this Court. Wells Fargo’s written consent to the removal is attached to this Notice.

7. Defendant has provided written notice of the filing of this Notice of Removal to Plaintiff by ordinary mail on this date and shall forward a Notice for filing with the Clerk of the Circuit Court for Anne Arundel County regarding this Notice of Removal.

WHEREFORE, Defendant Vital Recovery Services, Inc. prays that the above-captioned action now pending in the Circuit Court for Anne Arundel County be removed therefrom and placed on the regular docket of the United States District Court for the District of Maryland.

/s/James M. Connolly  
James M. Connolly (Bar No. 23872)  
Kramer & Connolly  
465 Main Street  
Reisterstown, Maryland 21136  
(410) 581-0070  
(410) 581-1524 Fax  
jmc@kramerslaw.com  
*Trial Attorney for Defendant*  
*Vital Recovery Services, Inc.*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on June 24, 2013, a copy of this Notice with attachments was mailed first class, postage prepaid, to:

Cory L. Zajdel, Esquire  
Z Law, LLC  
10811 Red Run Blvd., Ste. 204  
Owings Mills, MD 21117  
*Counsel for Plaintiffs*

Douglas B. Riley, Esquire  
Treanor Pope & Hughes, P.A.  
500 York Road  
Towson, Maryland 21204  
*Counsel for Defendant Wells Fargo Bank, N.A.*

/s/James M. Connolly  
James M. Connolly